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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

WESTERN ORGANIZATION OF  
RESOURCE COUNCILS et al.,

Plaintiffs,

vs.

UNITED STATES BUREAU OF  
LAND MANAGEMENT,

Defendant,

and

STATE OF WYOMING,

Intervenor-Defendant.

Case No. 4:20-cv-00076-BMM

**PLAINTIFFS' MOTION FOR  
COSTS AND ATTORNEYS' FEES**

In accordance with the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412, Plaintiffs submit this motion for costs and attorneys' fees. The reasons and authority supporting this motion are detailed in Plaintiffs' accompanying brief, declarations, and detailed time records. Following consultation with Federal Defendant U.S. Bureau of Land Management (BLM), the parties are simultaneously filing a joint motion to stay all briefing on this motion for 90 days in order to attempt to reach a negotiated settlement on costs and fees. BLM opposes this fee motion but has agreed to settlement talks during the 90-day stay period.

Respectfully submitted this 23rd day of December, 2022,

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